## THE STATE OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

V.

DOCKET NO. 13-CR-00001-JL

ANGEL RIVERA

## ASSENTED TO MOTION TO CONTINUE

NOW COMES the accused, Angel Rivera, by and through counsel, and hereby move this Court to continue his Pre-Trial Conference and Trial currently scheduled for August 12, 2013 and August 20, 2013, for 45 days.

In support of this Motion, the accused states as follows:

- 1. The accused is scheduled for Pre-Trial Conference on August 12, 2013 at 11:30 a.m. and for Trial on August 20, 2013, at 9:30 a.m. in this Court.
- The accused is requesting time to receive additional discovery that the Government is gathering, but has not yet obtained. This additional discovery consists of audio and video recordings of witnesses. The accused is asking for an additional 45 days.
- 3. The accused is also requesting additional time to discuss a potential non-trial disposition of this case.
- 4. In addition, the undersigned counsel is on vacation from August 10 through 17, 2012.
- 5. The defendant is aware of this motion.
- 6. That the United States Attorney's Office has no objection to this Motion to Continue.

WHEREFORE, the accused respectfully requests that this Court grant his Assented to Motion and Continue his August 12, 2013 Pre-Trial Conference and August 20, 2013 Trial.

Respectfully submitted Angel Rivera By his Attorney,

Date: August 5, 2013 /S/Paul J. Garrity

Paul J. Garrity

Bar No. 905 14 Londonderry Road Londonderry, NH 03053 603-434-4106

## **CERTIFICATE OF SERVICE**

I, Paul J. Garrity, herein certify that on this 5<sup>th</sup> day of August, 2013, a copy of the within Motion to Continue was e-filed to all parties of record, including the United States Attorney's Office and mailed, postage prepaid, to Angel Rivera.

/S/Paul J. Garrity
Paul J. Garrity